

Hearing Date: October 19, 2022
Objections Date: September 13, 2022
Reply Date: October 13, 2022

**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

SECURITIES INVESTOR PROTECTION
CORPORATION,

Plaintiff-Applicant,

v.

BERNARD L. MADOFF INVESTMENT
SECURITIES LLC,

Defendant.

Adv. Pro. No. 08-01789 (CGM)

SIPA Liquidation

(Substantively Consolidated)

In re:

BERNARD L. MADOFF,

Debtor.

IRVING H. PICARD, Trustee for the
Liquidation of Bernard L. Madoff Investment
Securities LLC,

Plaintiff,

v.

UKFP (ASIA) NOMINEES LIMITED,

Defendant.

Adv. Pro. No. 12-01566 (CGM)

ORAL ARGUMENT REQUESTED

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE that, upon the Memorandum of Law in Support of Defendant UKFP (Asia) Nominees Limited's ("UKFP" or "Defendant") Motion to Dismiss the Complaint, the accompanying Declaration of Joaquin M. C de Baca and exhibits attached thereto, and all prior pleadings and proceedings herein, UKFP respectfully moves this Court for an order dismissing with prejudice the Complaint (ECF No. 1) filed by Irving H. Picard, Trustee for the Liquidation of

Bernard L. Madoff Investment Securities LLC and Bernard L. Madoff, pursuant to the Federal Rules of Civil Procedure 12(b)(2) and 12(b)(6), made applicable here by Rule 7012(b) of the Federal Rules of Bankruptcy Procedure.

PLEASE TAKE FURTHER NOTICE that, pursuant to the Stipulation and Order dated April 15, 2022 (ECF No. 80), any oppositions to this motion shall be filed by September 13, 2022, and any reply in further support of this motion shall be filed by October 13, 2022.

PLEASE TAKE FURTHER NOTICE that, under Rule 7012(b) of the Federal Rules of Bankruptcy Procedure, Defendant does not consent to the entry of final orders or judgment by this Court.

Dated: July 15, 2022
New York, New York

Respectfully submitted,

MAYER BROWN LLP

By: /s/ Joaquin M. C de Baca
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